

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: : Bankruptcy No. 14-17727-elf
Deborah R. Malloy : Chapter 7
 :
Debtor : HEARING SCHEDULED FOR
 : September 9, 2015 at 10:00 a.m.
 : United States Bankruptcy Court
 : Courtroom 1
 : 900 Market Street
 : Philadelphia, PA 19107

**NOTICE OF MOTION, RESPONSE DEADLINE
AND HEARING DATE**

Debtor has filed a Motion for Reconsideration from the court's Order dated August 5, 2015, ("Lien Avoidance"), (Doc. # 133). Debtor is requesting the court correct the following errors: 1) correction of address of property; 2) correction of date Debtor commenced this bankruptcy case; 3) inclusion of debtor's wildcard exemption.

YOUR RIGHTS MAY BE AFFECTED. You should read these papers carefully and discuss them with your attorney if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before **August 28, 2015**, you or your attorney must do all of the following:

- a) File an answer explaining your position at: 900 Market Street, Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

- b) Mail a copy to movant's attorney:

Ed C. Malloy, Esq.
Generations Law, P.C.
PO Box 1946
Boothwyn, PA 19061
Phone: 610-485-3212
Fax: 484-480-5397
Email: generationslaw@aol.com

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.
3. A hearing on the motion is scheduled to be held before the Honorable Eric L. Frank on September 9, 2015 at 10:00 a.m. in Courtroom 1, United States Bankruptcy Court, 900 Market Street, Philadelphia, PA 19107.
4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from movant's attorney named in paragraph 1(b).
5. You may contact the Bankruptcy Clerk's office at (215) 408-2800 to find out whether a hearing has been canceled because no one filed an answer.

Date: August 12, 2015

**IN THE UNITED STATES BANKRUPTCY COURT
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**ORDER GRANTING DEBTOR'S MOTION FOR RECONSIDERATION
OF THIS COURT'S AUGUST 5, 2105 LIEN AVOIDNCE ORDER**

On this _____ day of _____, 2015, after notice and hearing it is hereby

ORDERED:

1. An amended Order will issue: correctly identifying "the Property" as 4205 Upland Drive, Boothwyn, Pa. (paragraph: B (p.1) and paragraph: 2 (p.3)).
2. An amended Order will issue: correctly identifying the date commenced this bankruptcy case as September 25, 2014 (paragraph; F (p.1)).
3. An amended Order will issue: applying the Debtor's Wildcard Exemption. Thus, avoiding the judicial lien except to the extent of \$6,397.98.

FOR THE COURT:

Eric L. Frank
United States Bankruptcy Judge

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IN RE:	:	Bankruptcy No. 14-17727-elf
Deborah R. Malloy	:	Chapter 7
	:	
Debtor	:	HEARING SCHEDULED FOR
	:	September 9, 2015 at 10:00 a.m.
	:	United States Bankruptcy Court
	:	Courtroom 1
	:	900 Market Street
	:	Philadelphia, PA 19107

**DEBTOR'S MOTION FOR RECONSIDERATION
OF THIS COURT'S AUGUST 5, 2105 LIEN AVOIDNCE ORDER**

TO THE HONORABLE ERIC L. FRANK
OF THE BANKRUPTCY COURT:

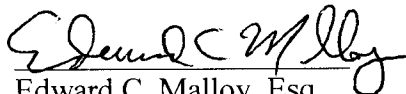
Debtor, Deborah R. Malloy, by and through her attorney, Edward C. Malloy, Esq., hereby moves the Honorable Court for an Order pursuant to F.R.C.P. 60(a) Corrections based on clerical mistakes; oversights and omissions, and in support thereof avers:

1. "The Property" is incorrectly identified as "4204 Upland Drive, Boothwyn, PA 19061". The correct address of "the Property" is: 4205 Upland Drive, Boothwyn, PA 19061. This clerical mistake is found at: paragraph: B (p.1) and paragraph: 2 (p.3).
2. The date of commencement of debtor's bankruptcy case is incorrectly identified as September 25, 2015. The correct date is September 25, 2014. This clerical mistake is found at: paragraph: F (p.1).
3. The court omitted the Debtor's Wildcard exemption from its lien avoidance calculation. The debtor, at paragraph 12 of her Motion To Avoid Judicial Lien On Residential Real Estate (Doc. #115) designated she would be

applying her “Wildcard” exemption (\$1,225.00) to her residence. Thus, avoiding the judicial lien except to the extent of \$6,397.98. This oversight/omission is found at: page 3, three (3) places.

WHEREFORE, Debtor, Deborah R. Malloy, moves this Honorable Court to enter an Order correcting these clerical mistakes, oversights and omissions.

Dated: August 12, 2015


Edward C. Malloy, Esq.
Debtor's Counsel

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CERTIFICATE OF SERVICE

I, Edward C. Malloy, Esq., certify that service of this Reconsideration Motion And Notice (August 5, 2015 Lien Avoidance Order) was made on August 12, 2015 by:

USPS First Class Mail, postage fully pre-paid, addressed to:

Hon. Eric Frank
U.S. Bankruptcy Court – Eastern District of Pennsylvania
900 Market Street, Suite 400
Philadelphia, PA 19107

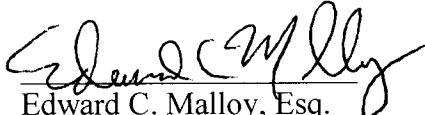
Kenneth E. West, Esq. (Counsel to creditor J & V Developers, Inc.)
Douglass, West & Associates
830 Lansdowne Avenue
Drexel Hill, PA 19026

Gary Seitz, Esq.
Chapter 7 Trustee
Gellert Scali Busenkell & Brown, LLC
The Curtis Center, Suite 280 South
601 Walnut Street
Philadelphia, PA 19106

Holly Smith, Esq.
Counsel to Trustee
Gellert Scali Busenkell & Brown, LLC
The Curtis Center, Suite 280 South
601 Walnut Street
Philadelphia, PA 19106

U.S. Trustee, Office of the U.S. Trustee
833 Chestnut Street, Suite 500
Philadelphia, PA 19061

Under penalty of perjury, I declare that the foregoing is true and correct.


Edward C. Malloy, Esq.

August 12, 2015